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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DAVID KUZAVA,

Plaintiff,

vs.

**CENTENNIAL TOYOTA AND
TOYOTA MOTOR CREDIT
CORPORATION,**

Defendants.

Case No.: 2:24-cv-00515-RFB-NJK

**Joint ~~Proposed~~ Discovery Plan and
Scheduling Order Submitted In
Compliance With LR 26-1(b)**

Plaintiff David Kuzava ("Plaintiff") and Defendants Centennial Toyota and Toyota Motor Credit Corporation (together as "Defendants") (jointly as the "Parties"), by and through their respective counsel, hereby submit this proposed Joint Discovery Plan and Scheduling Order.

The Parties propose the following discovery plan and scheduling order:

PROPOSED DISCOVERY PLAN

1. **Discovery Cut-Off Date:** Defendant filed its Answer on May 7, 2024. ECF No. 7. To allow for all discovery to take place, the proposed cut-off date for

1 discovery shall be **November 4, 2024**, 181 days from the date of Defendant's
2 Answer.

3 2. **Amending the Pleadings and Adding Parties:** All motions to amend
4 the pleadings or to add parties shall be filed no later than **August 5, 2024**, 90 days
5 prior to the proposed close of discovery.

6 3. **Fed.R.Civ.P. 26(a)(2) Disclosures (Experts):** Disclosures and reports
7 concerning experts shall be made by **September 4, 2024**, 60 days before the
8 proposed discovery cut-off date. Disclosures and reports concerning rebuttal experts
9 shall be made by **October 4, 2024**, 30 days after the initial disclosure of experts.

10 4. **Dispositive Motions:** The date for filing dispositive motions shall not be
11 later than **December 3, 2024**, 30 days after the proposed close of discovery. In the
12 event that the discovery period is extended from the discovery cut-off date set forth in
13 this proposed Discovery Plan and Scheduling Order, the date for filing dispositive
14 motions shall be extended to be not later than 30 days from the subsequent discovery
15 cut-off date.

16 5. **Pretrial Order:** The date for filing the joint pretrial order shall not be
17 later than **January 2, 2025**, 30 days after the cut-off date for filing dispositive
18 motions. In the event that dispositive motions are filed, the date for filing the joint
19 pretrial order shall be suspended until 30 days after decision on the dispositive
20 motions or until further order of the court. In the further event that the discovery
21 period is extended from the discovery cut-off date set forth in this Discovery Plan and
22 Scheduling Order, the date for filing the joint pretrial order shall be extended in
23 accordance with the time periods set forth in this paragraph.

24 6. **Pretrial Disclosures:** The disclosures required by Fed. R. Civ. P.
25 26(a)(3), and any objections thereto, shall be included in the joint pretrial order.

26 7. **Extensions or Modifications of the Discovery Plan and Scheduling**
27 **Order:** Applications to extend any date set by the discovery plan, scheduling order,
28 or other order must comply with the Local Rules.

1 8. **Initial Disclosures**: The Parties shall make initial disclosures on or
2 before **June 21, 2024**, to the extent that initial disclosures have not yet been made.

3 9. **Protective Order**: The Parties may seek to enter a stipulated protective
4 order pursuant to Rule 26(c) prior to producing any confidential documents.

5 10. **Electronic Service**: The Parties agree that electronic service of
6 discovery documents may be used.

7 11. **Alternative Dispute Resolution Certification**: The Parties certify that
8 they met and conferred about the possibility of using alternative dispute-resolution
9 processes including mediation, arbitration, and early neutral evaluation.

10 The Parties are generally agreeable to the Alternative Dispute Resolution
11 through, including but not limited to, mediation and early neutral evaluation after an
12 initial period of discovery.

13 12. **Alternative Forms of Case Disposition Certification**: The Parties
14 certify that they considered consent to trial by a magistrate judge under 28 U.S.C. §
15 636(c) and Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order
16 2013-01). The parties have not reached any stipulations at this stage.

17 13. **Electronic Evidence**: The Parties certify that they discussed the
18 possibility of producing documents in electronic format, which could then facilitate
19 presenting electronic evidence to jurors for the purposes of jury deliberations at trial.
20 The parties have not reached any stipulations at this stage.

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1 14. **Protective Order**: The parties discussed that entry of a stipulated
2 protective order and confidentiality agreement pursuant to Federal Rule of Civil
3 Procedure 26(c) may be appropriate in this case. If Defendants desire a stipulated
4 protective order governing confidential information, Plaintiff requests that a
5 stipulated protective order governing confidential information be filed by **July 18,**
6 **2024**, so as to not delay production of discovery.

7 DATED this 6th day of June 2024.

8 **KAZEROUNI LAW GROUP, APC**

9 By: /s/ Gustavo Ponce

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12 Las Vegas Nevada 89113

13 *Attorneys for Plaintiff*

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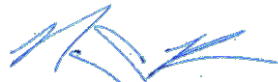
18 Las Vegas, NV 89101

19 *Attorneys for Defendants*

20 **SCHEDULING ORDER**

21 The above-set stipulated Discovery Plan of the Parties shall be the Scheduling
22 Order for this action pursuant to Federal Rule of Civil Procedure 16(b) and Local
23 Rule 16-1.

24 IT IS SO ORDERED:

25 

26 UNITED STATES MAGISTRATE JUDGE

27 DATED: June 7, 2024